

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
-ALEXANDRIA DIVISION-**

**ASHENDORF & ASSOCIATES LTD.**  
3 Fivcefields Close  
Watford, Herts WD19 5BZ,

**MICHAEL FREEDMAN**  
8 Marsh Point, Marsh Road  
Pinner, Middlesex HA5 5ND, and

**JAYHUN REZAYEV**  
146 Great West Rd  
Middlesex, London TW5 9AP

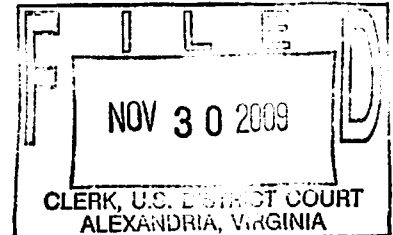
Plaintiffs,

v.

**SMI HYUNDAI CORPORATION**  
8300 Greensboro Drive, Suite 800  
McLean, VA 22102

Respondent

**CIVIL ACTION NO: 1:09CV1236 - GBL/IDD**




**NOTICE OF MOTION FOR ENLARGEMENT OF TIME**

PLEASE TAKE NOTICE, that the undersigned, on behalf of Respondent SMI Hyundai Corporation, will move this Court for an enlargement of time in order to respond to the Plaintiff Ashendorf & Associates LTD., *et. al*; at the Albert V. Bryan United States District Courthouse located at 401 Courthouse Square, Alexandria, VA 22314; at \_\_\_\_ o'clock, on the \_\_\_\_ day of December, 2009, or as soon thereafter as the Respondent can be heard, for the entry of an Order enlarging the time in which the Respondent may properly respond to the Plaintiff's November 4, 2009 Complaint.

Respectfully Submitted,


November 27, 2009

  
For: SMI HYUNDAI CORPORATION  
David Dale  
President/CEO  
8300 Greensboro Drive, Suite 800  
McLean, VA 22102

**CERTIFICATE OF SERVICE –**

I hereby certify that a copy of this letter was mailed, postage prepaid, this 23rd day of November, 2009, to Andrew A. Nicely and Amanda Hine, Counsel for the Plaintiffs, at their address of record: Mayer Brown LLP, 1999 K Street NW, Washington, DC 20006.

November 27, 2009

  
David Dale  
President/CEO  
8300 Greensboro Drive, Suite 800  
McLean, VA 22102